

U.S. Patent Application No.: 09/986,354  
Attorney Docket No.: 52493.000187

### REMARKS

The Office Action dated November 1, 2007, has been received and carefully considered. Reconsideration of the outstanding rejections in the present application is respectfully requested based on the following remarks.

Claims 1-21 and 23-28 are pending in the application. By this Amendment, claim 25 is amended. No new matter has been added. Support for the amendments may be found in paragraphs 0032 and 0033 of the published application (2003/0088443), for example. Claim 25 is amended to further recite novel features of the invention.

#### I. THE OBVIOUSNESS REJECTION OF CLAIMS 1-21 AND 23-28

On page 2 of the Office Action, claims 15-16 and 19-26 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Cullen (U.S. Patent No. 6,272,528) in view of Herz (U.S. Patent No. 5,835,087). On page 10 of the Office Action, claims 1-2, 4, 9-14 and 18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Cullen, in view of Herz, and further in view of Hsu (U.S. Publication No. 2006/0020530). On page 16 of the Office Action, claims 17 and 27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Cullen, in view of Herz, and further in view of Quido (U.S. Publication No. 2003/0093302). On page 17 of the Office Action, claims 3 and 5-7 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Cullen, in view of Herz, in view of Hsu, and further in view of Quido. On page 19 of the Office Action, claim 8 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Cullen, in view of Herz, in view of Hsu, and further in view of Parker (U.S. Publication No. 2003/0182290). These rejections are hereby respectfully traversed.

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As stated in MPEP § 214.3, to establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure. In re Vaack, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Applicants respectfully submit that the Office Action has not met the burden of proof in establishing the obviousness of independent claim 1 because Cullen in view of Herz and further in view of Hsu, taken either individually or in combination, do not teach or suggest all the claimed features. Further, the Office Action has failed to adequately explain the motivation to combine the applied art to Cullen, Herz and Hsu.

Specifically, Applicants respectfully submit that Cullen fails to disclose, or even suggest, "determining information about the user." (Emphasis added) In the Office Action, the Examiner appears to equate the insurance agent of Cullen to the recited filtering module in claim 1. Applicants respectfully disagree. In contrast, Cullen merely discloses that "the insurance agent requests information from the user's preference agent." See, e.g., column 5, lines 61-62. The insurance agent of Cullen does not determine information about the user, but rather, requests user information from the preference agent. Moreover, the preference agent of Cullen fails to perform the step of "determining information about the user," as presently recited. Instead, the preference agent of Cullen merely "handle[s] requests for information about user preferences" and "collects the required information from the user." See, e.g., column 4, lines 34-35 and

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column 5, line 67. Thus, Applicants respectfully submit that Cullen fails to disclose, or even suggest, "determining information about the user," as presently recited.

Also, Applicants respectfully submit that Cullen fails to disclose, or even suggest, a filtering module "for personalizing and delivering the at least one insurance or financial services-related product or service based on the information about the user," as presently recited in claim 1. (Emphasis added). The Office Action alleges that the insurance agent of Cullen teaches such recitation. Applicants respectfully disagree.

Applicants submit that "wherein personalizing the at least one insurance or financial services-related product or service comprises identifying at least one insurance or financial services-related product and service the user is authorized to sell" is not taught. In contrast, the insurance agent of Cullen merely arranges the received quotations from a quotation agent in order of price/suitability. Nowhere, does Cullen disclose that the insurance agent personalizes the at least one insurance or financial services-related or services by "identifying at least one insurance or financial services-related product and service the user is authorized to sell," as presently recited.

The Office Action asserts, and Applicants agree, that Cullen fails to disclose, or even suggest, the information about the user is "based on the user's historical access pattern to particular insurance products or policies and products and services the user is authorized to sell," and "identifying at least one insurance or financial services-related product and service the user is authorized to sell," as presently recited. However, the Office Action alleges Herz remedies such deficiencies. Applicants respectfully disagree. Specifically, Applicants submit that Herz appears to be concerned with "a filtering system in the system for customized electronic identification of desirable objects automatically selects a set of articles that the user is likely to

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wish to read." See, e.g., column 7, lines 22-25, Emphasis added. Nowhere does Herz disclose, or even suggest, "determining information about the user based on the user's historical access pattern to particular insurance products or policies and products and services the user is authorized to sell," as presently recited. Moreover, Herz appears to implement the filtering system by comparing the frequency with which each word appears in an article relative to its overall frequency of use in all articles with the target profile interest summary containing user's interest level in various types of target objects. See, e.g., Abstract. Therefore, Herz fails to disclose, or even suggest, determining the user's information "based on the user's historical access pattern to particular insurance products or policies and products and services the user is authorized to sell," as presently recited.

Furthermore, the Office Action asserts that the profile to product/service matching filter when applied to a seller constitutes identifying products or service the selling entity is authorized to sell. Applicants respectfully disagree. Applicants submit that Herz merely discloses "sellers submit profiles of the goods (target objects) they want to sell, and buyers submit profiles of the goods (target objects) they want to buy." See, e.g., column 17, lines 2-4. Therefore, the seller's information is submitted by the seller and not determined by the filtering system of Herz. Thus, the Office Action errors in asserting that the profile to product/service matching filter, when applied to a seller, constitutes identifying products or service the selling entity is authorized to sell. Even assuming *arguendo*, applying the filtering system of Herz to a seller as the Office Action asserts, Applicants respectfully submit that the seller would submit the information (e.g., target profile) and not perform the "determining information about the user based on the user's historical access pattern to particular insurance products or policies and products and services the user is authorized to sell," as presently recited.

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In addition, Applicants respectfully submit that Cullen teaches away applying the filtering system to a seller as the Office Action asserts. Specifically, Applicants submit that Cullen discloses "a customer wishing to purchase vehicle insurance, or a broker acting on behalf of a client, could access the websites of a number of insurance company to obtain the cheapest quotation to get a quotation which is most suitable to a consumer's needs." *See, e.g.,* column 1, lines 12-16. Therefore, the system of Cullen appears to apply to a consumer and not a seller as asserted by the Office Action. Even the broker accessing the system of Cullen, the broker is acting on behalf of a client by buying insurance. Therefore, Applicants respectfully submit that the system of Cullen would not be accessible to a seller as asserted by the Office Action.

Moreover, the Office Action asserts, and Applicants agree, that Cullen and Herz taken alone or in combination fails to disclose, or even suggest "the administration module being accessible to an administrator of the system via an administration interface," as presently recited.

The Office Action alleges that Hsu remedies such deficiency. Applicants respectfully disagree.

The Office Action appears to equate move/add/change (MAC) function 93 of Hsu to "the administration module being accessible to an administrator of the system via an administration interface," as presently recited. Rather, the MAC function of Hsu is for authentication purposes "which provides a single point control of all updates to user preference profiles, which in turn perform synchronous updates to all required security platform." *See, e.g.,* paragraph [0101].

Therefore, the MAC function of Hsu does not enable an administrator of the system "to inputting, updating and accessing information about the user and the insurance or financial services-related content available to the user" via an administration interface.

Further, Applicants respectfully submit that there is not sufficient motivation to combine the teaching of Hsu with the system of Cullen. More specifically, the system of Cullen discloses

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a log-in agent for authenticating a user into the system which requires the log-in agent to move between the user computer and the intermediary agent servers. *See, e.g.,* column 4, lines 4-24. While the MAC function of Hsu is located at a branch of the bank. *See, e.g.,* [0101]. Therefore, one having ordinary skill in the art would not utilize a static MAC function of Hsu for the mobile log-in agent of Cullen.

Regarding claims 2-14, these claims are dependent upon independent claim 1. Thus, since independent claim 1 should be allowable as discussed above, claims 2-14 should also be allowable at least by virtue of their dependency on independent claim 1. Moreover, these claims recite additional features which are not disclosed, or even suggested, by the cited references taken either alone or in combination. For example, claim 8 recites "the administration interface further comprises scanning means for uploading insurance or financial services-related information." The Office Action merely cites to paragraph 23 of Parker as disclosure of such recitation. Applicants respectfully disagree. In contrast, Parker teaches "it is not necessary for the client to store all information with the ELOP program administrator." Rather, Parker teaches scanning documents to be stored by the ELOP program provider. Moreover, nowhere does Parker disclose, or even suggest, an "administration interface further comprises scanning means for uploading insurance or financial service-related information," as presently recited.

Regarding claims 15 and 25, these claims recite subject matter related to claim 1. Thus, the arguments set forth above with respect to claim 1 are equally applicable to claims 15 and 25. Accordingly, it is respectfully submitted that claim 15 and 25 are allowable over cited references for the same reasons as set forth above with respect to claim 1.

Moreover, regarding claims 16-21, 23-24, and 26-28, these claims are dependent upon independent claims 15 and 25. Thus, since independent claims 15 and 25 should be allowable as

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discussed above, claims 16-21, 23-24, and 26-28, should also be allowable at least by virtue of their dependency on independent claims 15 and 25. Moreover, these claims recite additional features which are not disclosed, or even suggested, by the cited references taken either alone or in combination.

In view of the foregoing, it is respectfully requested that the aforementioned obviousness rejection of claims 1-21 and 23-28 be withdrawn.

## II. CONCLUSION

In view of the foregoing, it is respectfully submitted that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number, in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

To the extent necessary, a petition for an extension of time under 37 CFR § 1.136 is hereby made.

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Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-0206, and please credit any excess fees to the same deposit account.

Respectfully submitted,

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